

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 17-151-LPS

DECLARATION OF JASON W. MYATT

I, JASON W. MYATT, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, which is counsel for Plaintiff and Judgment Creditor Crystallex International Corporation (“Crystallex”) in the above-captioned action.

2. I make this declaration in connection with Crystallex’s reply brief in support of its Motion for an Order Compelling PDVH To Immediately Reissue The Share Certificate.

3. Attached hereto as Exhibit I is a true and correct copy of Petróleos de Venezuela, S.A.’s Answering Brief in Response to Order to Show Cause Why a Replacement Share Certificate Must Be Issued, filed September 12, 2023 in Case No. 2023-0778-PAF in the Court of Chancery of the State of Delaware (the “Chancery Court Action”).

4. Attached hereto as Exhibit J is a true and correct copy of the public version of PDV Holding, Inc.’s Reply Brief in Response to Order to Show Cause Why It Should Not Issue Replacement Shares to Plaintiff, filed September 21, 2023 in the Chancery Court Action.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on September 25, 2023, in New York, New York.



Jason W. Myatt